



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240



Mr. John Wilson
Environmental Protection Agency
Assessment and Watershed Protection Division (AWPD) (4503F)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Mr. Wilson:

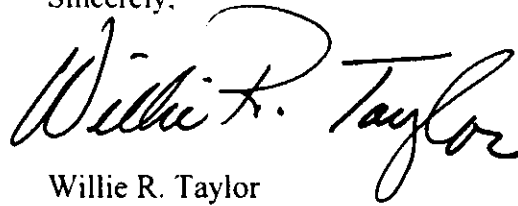
The Department of the Interior has reviewed the Draft Plan of Action for Reducing, Mitigating, and Controlling Hypoxia in the Northern Gulf of Mexico. We have the following comments.

On page 42691 of the Federal Register notice, we believe that EPA should consider an alternative for the Coastal Goal that is a hybrid of the three alternatives listed. The following three comments relate to the three alternatives and note the shortcomings of each. We recommend that you consider using the strengths of each alternative in a hybrid to achieve better results.

1. Nitrogen reductions should be assessed to gauge whether the implementation actions are having any effect on pollutant loads, but they should not be considered the absolute measure of whether the areal extent of hypoxia is becoming reduced or under control. Long-term measure of hypoxia conditions would be necessary to confirm that control of nitrogen loads is resulting in hypoxia control/reduction.
2. The areal extent of hypoxia in the Gulf is affected by numerous factors, including weather as well as pollution inputs. It may be too difficult to relate extent of hypoxia to actual reductions in pollutant inputs for a given amount of time. However, considering that the purpose of this action plan is to reduce/control hypoxia conditions in the Gulf, it should definitely be part of the assessment scheme but maybe further in the long-term than every 5 years.
3. Assessing efforts of States and tribes in protection of resources may be considerably easier or less costly to measure than the other goal alternatives, however, program implementation does not necessarily translate to water quality benefits. Measures of nitrogen reduction and hypoxic extent would be necessary to confirm that programs are being effectively implemented to control/reduce hypoxia.

We appreciate the opportunity to comment on this project.

Sincerely,

A handwritten signature in black ink that reads "Willie R. Taylor". The signature is written in a cursive style with a large, looping "W" and a long, sweeping "T".

Willie R. Taylor
Director, Office of Environmental
Policy and Compliance